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Jasmine K. Gardner



jgardner@mcguirewoods.cor

December 13, 2018

VIA ELECTRONIC FILING

Ms. Jocelyn G. Boyd Chief Clerk and Administrator The Public Service Commission of South Carolina Synergy Business Park 101 Executive Center Drive Columbia, South Carolina 29210

Re: GCRM-147, Docket No. 2006-401-G

Dear Ms. Boyd:

On behalf of Piedmont Natural Gas Company, Inc. ("Piedmont"), I have enclosed various schedules constituting Piedmont's GCRM-147.

The rate changes reflected in this filing, as shown on the attached schedules, are necessary to update Piedmont's rates to reflect changes in Piedmont's wholesale costs of gas. Wholesale futures contract prices for natural gas deliveries, as reflected on the New York Mercantile Exchange, are currently at levels above the \$3.00 per dekatherm commodity cost of gas reflected in Piedmont's current rates.

Based on the differential between Piedmont's existing benchmark cost of gas and the futures wholesale price, as well as the current balance in its deferred gas cost account, Piedmont is at risk of under-collecting its wholesale gas costs if the benchmark cost of gas reflected in its rates is not increased to \$3.75 per dekatherm as proposed herein. The relief requested herein will mitigate such under-collection and will also ensure that the wholesale gas costs reflected in Piedmont's rates are reasonably consistent with the prevailing market price for natural gas, thereby avoiding the creation of artificial market signals/incentives to parties who utilize this commodity for fuel or process purposes. The rate changes proposed herein are an increase of \$0.07633/therm for sales rate schedules (201, 202, 242, 252, 203 and 204) and an increase of \$0.00133/therm for transportation rate schedules (213 and 214).

Piedmont hereby requests approval of this GCRM filing in time to implement these rate changes effective with the first billing cycle in January, 2019.

Ms. Jocelyn G. Boyd December 13, 2018 Page 2

If you have any questions regarding this matter, you may reach me at the number shown above.

Sincerely,

/s/ Jasmine K. Gardner

Jasmine K. Gardner

Enclosures

cc: Bruce Barkley

Pia Powers Brian Heslin Jim Jeffries

Office of Regulatory Staff (via email and overnight delivery)

STATE OF NORTH CAROLINA

VERIFICATION

COUNTY OF MECKLENBURG

Kally A. Couzens, being duly sworn, deposes and says that she is Rates & Regulatory Strategy Manager – Regulatory Affairs of Piedmont Natural Gas Company, Inc., that as such, she has read the foregoing and knows the contents thereof; and she believes that the facts set forth therein are true and correct.

Kally A. Couzens

Mecklenburg County, North Carolina Signed and sworn to before me this day by Kally A. Couzens

Date: 12/13/2018

Notary Public

(Official Seal)

My commission expires:

11/29/2021



Schedule A

Piedmont Natural Gas Company, Inc.
State of South Carolina
Proposed Benchmark Commodity Rate Change - GCRM 147, Docket No. 2006-401-G

		(a)	(b) GCRM-147	(c)	
		November 2018 Current	COG Commodity Rate	January 2019 Proposed	
Rate S	Schedules:	Billing Rates ¹	<u>Change</u>	Billing Rates	
201	Residential Service				
	Monthly Charge-winter	10.00	-	10.00	
	Monthly Charge-summer	8.00	-	8.00	
	Winter (NovMar.) per therm	0.80572	0.07633	0.88205	
	Summer (AprOct.) per therm	0.76231	0.07633	0.83864	
202	Small General Service				
	Monthly Charge	22.00	-	22.00	
	Winter (NovMar.) per therm	0.72125	0.07633	0.79758	
	Summer (AprOct.) per therm	0.71033	0.07633	0.78666	
252					
	Monthly Charge	75.00	-	75.00	
	Winter (NovMar.) per therm	0.69000	0.07633	0.76633	
040	Summer (AprOct.) per therm	0.67908	0.07633	0.75541	
242	Natural Gas Vehicle Fuel Service	0.50744	0.07022	0.07047	
	Winter (NovMar.) per therm	0.59714 0.59714	0.07633 0.07633	0.67347	
	Summer (AprOct.) per therm Winter (NovMar.) per GGE ²		0.07633	0.67347	
	Summer (AprOct.) per GGE ²	0.75240		0.84857	
040	· · /·	0.75240		0.84857	
243	Experimental Motor Vehicle Fuel Service	navias ku sustaman	nou thain connormanding u	ata sahadula	
	Monthly Charge Winter (NovMar.)		per their corresponding re		
	Summer (AprOct.)		per their corresponding ro per their corresponding ro		
203		varies by customer p	per ineir corresponding re	ne scheune	
	Monthly Charge	250.00	_	250.00	
	Billing Demand per therm	1.10000	-	1.10000	
	Winter (NovMar.) per therm				
	First 15,000	0.53648	0.07633	0.61281	
	Next 15,000	0.47077	0.07633	0.54710	
	Next 75,000	0.42274	0.07633	0.49907	
	Next 165,000	0.37650	0.07633	0.45283	
	Next 330,000	0.32936	0.07633	0.40569	
	Over 600,000	0.30579	0.07633	0.38212	
	Summer (AprOct.) per therm				
	First 15,000	0.46220	0.07633	0.53853	
	Next 15,000	0.41507	0.07633	0.49140	
	Next 75,000	0.38560	0.07633	0.46193	
	Next 165,000	0.35793	0.07633	0.43426	
	Next 330,000	0.32936	0.07633	0.40569	
204	Over 600,000	0.30579	0.07633	0.38212	
204	Interruptible Sales Service	250.00		250.00	
	Monthly Charge Winter (NovMar.) per therm	250.00	-	250.00	
	First 15,000	0.56148	0.07633	0.63781	
	Next 15,000	0.49577	0.07633	0.57210	
	Next 75,000	0.44864	0.07633	0.52497	
	Next 165,000	0.40300	0.07633	0.47933	
	Next 330,000	0.35336	0.07633	0.42969	
	Over 600,000	0.33079	0.07633	0.40712	
	Summer (AprOct.) per therm				
	First 15,000	0.48720	0.07633	0.56353	
	Next 15,000	0.44007	0.07633	0.51640	
	Next 75,000	0.41150	0.07633	0.48783	
	Next 165,000	0.38443	0.07633	0.46076	
	Next 330,000	0.35336	0.07633	0.42969	
	Over 600,000	0.33079	0.07633	0.40712	
205	Outdoor Gas Light Service				
	Per Fixture/Mo.	15.00	-	15.00	

Piedmont Natural Gas Company, Inc. State of South Carolina Proposed Benchmark Commodity Rate Change - GCRM 147, Docket No. 2006-401-G

		(a) (b) GCRM-147		(c)	
		November 2018 Current	COG Commodity Rate	January 2019 Proposed	
Rate Schedules:		Billing Rates ¹	<u>Change</u>	Billing Rates	
213	Large General Transportation Service				
	Monthly Charge	250.00	-	250.00	
	Standby Demand per therm	0.45000	-	0.45000	
	Billing Demand per therm	0.80000	-	0.80000	
	Winter (NovMar.) per therm				
	First 15,000	0.21048	0.00133	0.21181	
	Next 15,000	0.14877	0.00133	0.15010	
	Next 75,000	0.10804	0.00133	0.10937	
	Next 165,000	0.06650	0.00133	0.06783	
	Next 330,000	0.02476	0.00133	0.02609	
	Over 600,000	0.00579	0.00133	0.00712	
	Summer (AprOct.) per therm				
	First 15,000	0.13620	0.00133	0.13753	
	Next 15,000	0.09307	0.00133	0.09440	
	Next 75,000	0.07090	0.00133	0.07223	
	Next 165,000	0.04793	0.00133	0.04926	
	Next 330,000	0.02476	0.00133	0.02609	
	Over 600,000	0.00579	0.00133	0.00712	
214	Interruptible Transportation Service				
	Monthly Charge	250.00	-	250.00	
	Winter (NovMar.) per therm				
	First 15,000	0.22648	0.00133	0.22781	
	Next 15,000	0.16577	0.00133	0.16710	
	Next 75,000	0.11364	0.00133	0.11497	
	Next 165,000	0.07250	0.00133	0.07383	
	Next 330,000	0.03136	0.00133	0.03269	
	Over 600,000	0.00579	0.00133	0.00712	
	Summer (AprOct.) per therm				
	First 15,000	0.15220	0.00133	0.15353	
	Next 15,000	0.11007	0.00133	0.11140	
	Next 75,000	0.07650	0.00133	0.07783	
	Next 165,000	0.05393	0.00133	0.05526	
	Next 330,000	0.03136	0.00133	0.03269	
	Over 600,000	0.00579	0.00133	0.00712	

^{1/} The rates in Column (a) are the same as those shown in the Company's Etariff filing revision #E2018-256 (version 30) approved on 10/31/18.
2/ The rates convert 1.26 therms to 1 GGE.

Schedule B

Piedmont Natural Gas Company, Inc. State of South Carolina Commodity Cost of Gas Calculation Docket No. 2006-401-G GCRM - 147 Schedule B Page 1 of 1

	Annualized Throughput (DT) per Docket 2018-7-G Settlement Approved on 10/3/2018, Order No. 2018-679	Proposed Commodity Rate per (DT)		<u>Total</u>	
Sales	15,337,035	\$	3.75	\$	57,513,881
Transportation	5,610,407				
Total Throughput	20,947,442				
LAUF %	1.77%				
Company Use & Lost And Unacct For	370,770	\$	3.75	\$	1,390,388
Total Throughput					20,947,442
Calculated Rate - LAUF					0.0664
Proposed Sales Commodity Rate per DT Proposed Sales Commodity Rate per Therm Current Sales Commodity Rate per Therm Adjustment to Sales Commodity Rate per Therm					3.81640 0.38164 0.30531 0.07633
Proposed Transportation Commodity Rate per DT Proposed Transportation Commodity Rate per Therm Current Transportation Commodity Rate per Therm Adjustment to Transportation Commodity Rate per Therm			\$ \$ \$	0.06640 0.00664 0.00531 0.00133	
Current Benchmark Proposed Benchmark				\$ \$	3.00 3.75

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached document is being served this date via email and FedEx Overnight upon:

Jeffrey M. Nelson
Office of Regulatory Staff
1401 Main Street
Suite 900
Columbia, South Carolina 29201
jnelson@regstaff.sc.gov

And that a copy of the attached document is being served this date via email or U.S. Mail upon:

Bruce Barkley
Vice President
Regulatory and Community Relations
Piedmont Natural Gas Company, Inc.
P.O. Box 33068
Charlotte, North Carolina 28233
bruce.barkley@piedmontng.com

and

Pia Powers

Director – Gas Rates & Regulatory Affairs
Piedmont Natural Gas Company, Inc.
P.O. Box 33068

Charlotte, North Carolina 28233
pia.powers@piedmontng.com

This the 13th day of December, 2018.

/s/ Richard K. Goley Richard K. Goley